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Remarks

In connection with the above-referenced patent application, and in response to the Office Action dated June 18, 2008 in connection therewith, Applicants hereby amend the claims as provided herein, and respectfully request reconsideration of the application in light of these amendments. Specifically, Applicants submit that, in light of the amendments herein, the claims are patentable over the cited references and the application is in condition for allowance.

In the instant application, claims 1-26 are pending. In the instant Office Action, claims 2 and 4 stand objected to as being identical; claims 1, 2, 4, 8, 11-15, 17, 22 and 25 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,823,055, issued on Nov. 23, 2004 to G. Mayer *et al.* (hereinafter, "*Mayer*"); and claims 3, 5-7, 9, 10, 18-21, 23 and 24 stand rejected under 35 U.S.C. 103 as being unpatentable over *Mayer* in view of U.S. Patent No. 6,622,016, issued on Sept. 16, 2003 to T. Sladek *et al.* Claims 16 and 26 stand objected to as being dependent upon a rejected base claim but have been indicated as comprising allowable subject matter.

Applicants would like to thank the Examiner for the indication of allowable subject matter with respect to claims 16 and 26. However, by way of the present amendment, Applicants have amended each of independent claims 1 and 17 to more clearly recite the Applicants' invention, and herein traverse the outstanding rejection of all rejected claims, particularly in light of these clarifying amendments. In addition, Applicants have amended claims 2-5 herein by modifying the dependencies thereof, thereby making claims 2 and 4 dependent from different claims (*i.e.*, from claims 3 and 5, respectively, which now each depend from claim 1), and thereby making this objection moot. Finally, Applicants have also amended claim 13 to correct a minor error therein and to clarify the meaning of the claim.

The present invention is directed to a method of (and apparatus for) emulating a given user's "home" telecommunications network environment when he or she is using a remote telecommunications device associated with (*e.g.*, connected to) a telecommunications network different than the user's home network. Typically, these two different telecommunications networks are operated by different service providers. By way of this amendment, independent claims 1 and 17 have been amended to clarify the above by reciting specifically that "the home telecommunications environment compris[es] a home telecommunications network" and that "the

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remote telecommunications device [is] associated with a *different* telecommunications network than said home telecommunications network” (emphasis added).

Mayer, on the other hand, does not address multiple communications networks at all. Rather, *Mayer* only teaches “inter-node user mobility in a [single] communications network” (see, e.g., *Mayer* abstract). That is, a user in *Mayer* is enabled to operate a “terminal coupled to a first network node” because “user-oriented configuration data are requested by a home network node . . . and are subsequently transmitted to the first network node” (see, e.g., *Mayer* abstract). As such, all that is taught by *Mayer* (in relevant part) is that one node (the “first network node” of *Mayer*) of a *single telecommunications network* can receive “configuration data” from another node (the “home network node” of *Mayer*).

The present invention as claimed in independent claims 1 and 17, however, recite “instructing the telecommunications network associated with the remote telecommunications device [which is a different network than the home telecommunications network] *to process signaling information* associated with the user’s use of the remote telecommunications device based on the determined home telecommunications network” (emphasis added). *Mayer* does not teach or suggest “instructing [a] telecommunications network . . . to process signaling information” at all. There is no signaling information in *Mayer* which needs to be specifically processed, since the two nodes at issue are part of one and the same network. The only information that is processed in *Mayer* is “user-oriented configuration” information.

More specifically, as described clearly in the instant specification, “the roaming proxy determines the “home” network for the user [and] [t]hen, all signaling information is processed based on the determined home network, *such that the use of the remotely located telephone functions as if it were connected directly to the home network*” (see the instant specification, page 8, lines 12-15, emphasis added). Each of the illustrative embodiments described in the instant specification provide more specific illustrative examples of the respective processing of signaling information so that “the remotely located telephone functions as if it were connected directly to the home network.” (See the instant specification, Figures 1-5, and corresponding text on page 10, line 13 through page 11, line 4; page 11, lines 9 through page 12, line 2; page 12, lines 8-19; page 13, line 12 through page 14, line 12; and page 14, line 21 through page 15, line 5, respectively.)

Moreover, and partly for the above-described reasons, Applicants respectfully disagree with

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the Office Action's allegation that "[t]he entire patent to Mayer is plainly directed to the claimed instructing a telecommunications network (NK1) associated with the remote telecommunications device (EG) to process signaling information associated with user's use of the remote telecommunications device based on the determined home telecommunications network (NK2), thereby emulating the home telecommunications environment for the user." (See the instant Office Action, page 3, lines 2-7.) First of all, as pointed out above, NK1 and NK2 of *Mayer* are not (different) telecommunications networks at all – they are merely two network nodes in a single telecommunications network. And second of all, as also pointed out above, NK1 is not instructed to process *signaling information* at all – it is merely provided with user-oriented configuration data (received from the home network node, NK2).

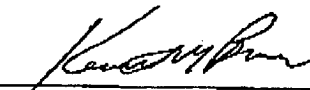
Finally, Applicants respectfully submit that the expressed basis for the outstanding rejection of claim 13 is further without merit. The instant Office Action rejects claim 13 under 35 U.S.C. 102(e), stating that "[w]ith respect to claim 13, some type of agreement has to be inherent or else the system of Mayer could not operate." This unsupported statement even more clearly shows the distinction between the teaching of *Mayer* and the claims of the instant invention. It is precisely because *Mayer* teaches only a *single* communications network that there does not need to be any kind of agreement – either implicit or explicit. That is, the *Mayer* environment consists of a single communications network operated by a single service provider or other operator. There is obviously no reason that the operator of a (single) communications network needs to have an agreement with itself in order for two network nodes in the network to "cooperate" with each other. In the instant invention as claimed, however, since the "home communications network" and the "remote telecommunications network" are separate networks, they may, in fact, be operated by *different* service providers and therefore there may, in fact, need to be an *explicit* agreement between those service providers to effectuate the advantages of the present invention.

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For the above reasons, Applicants respectfully submit that each of independent claims 1 and 17, as amended, is patentable over the cited references. And since each of the remaining pending claims (*i.e.*, claims 2-16 and 18-26) depend from one of these independent claims, each of these claims is patentable for at least the same reasons. As such, Applicants respectfully submit that the instant application is in condition for allowance. Reconsideration of this application is respectfully requested in light of this submission. The Examiner is invited to telephone Applicant's attorney, Kenneth M. Brown, at (908) 582-5998, should there be any questions or issues for discussion in the reconsideration of the pending application.

Respectfully,

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